



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

April 1, 2005

Mr. Matthew F. Letany, Director  
Environmental, Safety & Health  
Wyle Laboratories  
128 Maryland Street  
El Segundo, California 90245-4115

### APPROVAL OF FINAL REMEDIAL INVESTIGATION (RI) WORKPLAN, WYLE LABORATORIES, 1841 HILLSIDE AVENUE, NORCO, CALIFORNIA (Site)

Dear Mr. Letany:

The Department of Toxic Substances Control (DTSC) has reviewed the RI Workplan (Workplan), submitted by Environ, dated March 18, 2005 and received on March 22, 2005. The Workplan presents characterization strategy onsite and off-site near Wyle's northwestern boundary.

Based on its review, DTSC identified outstanding issues that should be addressed during implementation of the Workplan. Enclosed is a set of comments from DTSC project team identifying these issues. DTSC hereby approves the Workplan provided Wyle complies with the enclosed comments. Wyle should start implementation of the Workplan by April 4, 2005.

If you have any questions, please contact Mr. Juan Osornio, Project Manager at (714) 484-5498 or me at (714) 484-5368.

Sincerely,

Shahir Haddad, P.E.  
Unit Chief  
Cypress Branch  
School Property Evaluation and Cleanup Division

Enclosures

cc: See next page.

Mr. Matthew F. Letany  
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cc: Mr. Drexel L. Smith  
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cc: Mr. Kamron Saremi, P.E.  
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21865 Copley Drive  
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**DTSC COMMENTS**  
**FINAL REMEDIAL INVESTIGATION WORK PLAN**  
**WYLE LABORATORIES, NORCO**

The following DTSC staff reviewed and provided comments herein to the Revised Remedial Investigation (RI) Workplan. Original comments from the Human and Ecological Risk Division (HERD) and Geological Services Unit (GSU) are available for review in DTSC project files.

**Mr/ Juan Osornio**  
**Project Manager**  
**Schools Unit – Cypress**

For all step out and/or step down sampling, when necessary, Wyle should submit a Technical Memorandum that includes data summary, lab sheets, data validation information, an evaluation of the data, a figure showing the proposed step out locations, and the recommendation/rationale for the additional work.

**Mr. Ronald Okuda, R.G.**  
**Engineering Geologist**  
**Geological Services Unit**

Section 5.1.3, Northwest Area (Immediately North of Area A); Section 5.2.1, Additional Investigation in Northwest Area; Appendix U, Figure 1, Existing and Proposed Sampling Locations

Proposed soil gas and grab groundwater sample locations ESG-83, ESG-84, ESG-85, ESG-86, and ESG-87 should be relocated south of their proposed locations to within 200 feet of Third Street. The purpose of collecting grab groundwater samples is to detect elevated concentrations of VOCs in shallow groundwater that have a potential to volatilize and migrate into homes. Grab groundwater samples cannot be used to define the lateral extent of the contamination plume because VOC losses can occur during sampling. The grab groundwater samples also cannot be used to define the vertical extent of contamination. The proposed offsite work is the first phase of groundwater characterization and additional groundwater investigation is necessary to define the lateral and vertical extent of contamination.

Wyle should submit detailed information describing the offsite work conducted in December 2004 and January 2005. Critical information such as the groundwater and hydrogeologic data from installation and sampling of monitoring wells MW-19 and MW-20 was not included in the RAW or RI Work Plan. A report of the offsite work, including the quality assurance/data validation information, should be submitted to DTSC by April 15, 2005.

**William Bosan, Ph.D.**  
**Staff Toxicologist**  
**Human and Ecological Risk Division**

1. Page 104, Section 7.0 (Baseline Human Health Risk Assessment): Throughout this section, State of California Guidance is referenced as "Cal/USEPA." This reference should actually be Cal/EPA, and the referenced guidance documents are actually Department of Toxic Substances Control (DTSC) documents.

HERD also previously recommended re-arranging the exposure equations to derive risk-based screening criteria in order to evaluate the need to conduct step-out/step-down sampling based on site- or area-specific concentrations. Wyle should develop this criteria, in consultation with DTSC, by April 30, 2005.

2. Page 109, Section 7.4.1 (Modeling of Vapor Intrusion from Soil and Ground Water to Air): The Johnson and Ettinger (J&E) Model referenced should be the most recent version of the DTSC-modified J&E Model, available for downloading at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).